

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 1:13-md-02419
Hon. F. Dennis Saylor, IV

THIS DOCUMENT RELATES TO:

All Actions

DECLARATION OF ROGER NG, M.D.

Roger Ng, M.D., declares the following under penalty of perjury:

1. I am a member of Rochester Brain and Spine Neurosurgery and Pain Management, LLC ("RBS"). RBS is a limited liability company created under the laws of the State of New York.
2. I am a physician licensed to practice medicine in the State of New York.
3. RBS offers comprehensive evaluation and management to patients with spine and musculoskeletal disorders. This involves a comprehensive multidisciplinary approach to the diagnosis and care of neck and back problems, including the full spectrum of non-surgical and surgical treatments of most conditions of the adult spine.
4. The offices of RBS are located in Rochester, New York.

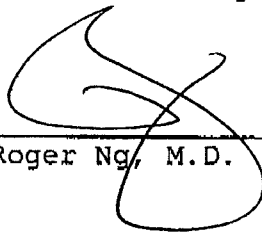
5. Patients who attend RBS are treated by physicians, or are treated under physician supervision. All treatment takes place in the State of New York.

6. In each instance, a physician-patient relationship results from the professional practice of medicine. All physicians, as well as those working under their supervision, reside in the State of New York.

7. It is my information and belief that the laws and regulations of the State of New York prevent the release of information concerning patients treated by or under the supervision of our physicians.

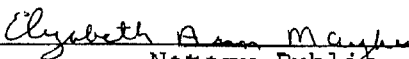
8. We have not received a waiver of the privilege from any patient whose treatment included the administration of MDA. None of RBS 's patients is a plaintiff in the MDL or any related action.

9. The subpoena attached to RBS's Objections was not personally served on RBS.



Roger Ng, M.D.

Subscribed and sworn to before me
this 25th day of July, 2013.



Notary Public

ELIZABETH ANN MAYBEE
Notary Public, State of New York
No. 6093147
Qualified Livingston County, NY
Commission Expires 6/2/15